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5 CONTINUED DEPOSITION OF TONJA CATHERINE BURDEN
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12 DATE: SATURDAY, NOVEMBER 21, 1981
13 TIME: 10:05 O'CLOCK A.M.
14 LOCATION: MGM GRAND HOTEL
15 3645 LAS VEGAS BOULEVARD SOUTH
SUITE 1076-A
16 LAS VEGAS, NEVADA 89109
17
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21 REPORTED BY: E. ANN QUINN, C.S.R. NO. 115
22 COURT REPORTER - NOTARY PUBLIC
23
24
25

1 A NO. SHE QUOTED THE NEWSPAPERS. IT WAS
2 CORRECT TO MY KNOWLEDGE. THEY WERE CORRECT.
3 Q HAVE YOU EVER RECEIVED ANY WRITTEN
4 COMMUNICATIONS FROM KEVIN FLYNN SINCE THE TIME YOU LEFT
5 THE CHURCH OF SCIENTOLOGY?
6 MR. FLYNN: ANSWER YES OR NO.
7 THE WITNESS: YEAH.
8 Q (BY MR. GELLER) AND HOW MANY, IF YOU
9 RECALL?
10 A HOW MANY WHAT -- PHONE CALLS? LETTERS?
11 Q LETTERS?
12 A LETTERS?
13 I DON'T THINK KEVIN WROTE ME ANY
14 LETTERS. THAT'S THE COVER SHEET, YOU KNOW, HE MIGHT --
15 MR. FLYNN: THAT'S FROM ME. THAT'S A
16 COMMUNICATION FROM ME.
17 THE WITNESS: I DON'T THINK KEVIN HAS
18 WRITTEN LIKE THAT.
19 Q (BY MR. GELLER) DID KEVIN EVER TELEPHONE
20 YOU?
21 A YEAH, HE CALLED ME.
22 Q HOW MANY TIMES?
23 A I DON'T KNOW. MORE THAN ONCE.
24 Q WHEN WAS THE FIRST PHONE CALL YOU RECEIVED
25 FROM KEVIN FLYNN?

1 A THE DAY BEFORE I FLEW TO BOSTON.
2 Q WHAT DID HE TELL YOU TO DO IN THAT --
3 WHAT WAS THE CONTENT OF THIS CONVERSATION?
4 MR. FLYNN: DON'T ANSWER THAT QUESTION.
5 FOR THE RECORD, KEVIN FLYNN AT THAT
6 TIME WAS WORKING FOR ME, AN EMPLOYEE, AS AN INVESTIGATOR
7 AND PARALEGAL IN MY OFFICE.
8 Q (BY MR. GELLER) THIS IS BEFORE THE FIRST
9 TIME YOU FLEW TO BOSTON? IS THAT RIGHT?
10 A UH-HUH, THE NIGHT BEFORE.
11 Q THE NIGHT YOU FLEW TO BOSTON --
12 MR. FLYNN: GO AHEAD AND ANSWER THAT ONE,
13 IF YOU REMEMBER.
14 MR. GELLER: THANK YOU, MR. FLYNN.
15 THE WITNESS: HE ASKED ME IF I KNEW EDDIE
16 WALTERS.
17 Q (BY MR. GELLER) WHAT DID YOU RESPOND?
18 A YEAH -- I DIDN'T REALLY KNOW HIM. I KNEW
19 OF HIM. I HAD MET HIM.
20 Q IS THAT WHAT YOU TOLD MR. FLYNN?
21 A KEVIN FLYNN, YEAH.
22 Q THEN WHAT DID HE SAY TO YOU?
23 A SOMETHING ABOUT COULD I FLY OUT -- WAS
24 I WILLING TO DISCUSS MY EXPERIENCE OR SOMETHING -- THIS
25 IS NOT HIS EXACT WORDS. HE COULD HAVE SAID A FEW THINGS --

1 I FORGET, BUT THINGS IF I WAS WILLING TO DISCUSS MY
2 EXPERIENCE IN SCIENTOLOGY WITH AN ATTORNEY.
3 AND HE EXPLAINED THAT HE WAS, YOU
4 KNOW, ABOUT MICHAEL FLYNN AS AN ATTORNEY, AND DA-DAH,
5 DA-DAH, DA-DAH.
6 Q WHAT DID HE TELL YOU ABOUT MICHAEL FLYNN?
7 A THAT HE KNEW ABOUT SCIENTOLOGY AND THAT
8 HE HAD COMMUNICATED WITH EDDIE WALTERS, AND EDDIE WALTERS,
9 I GUESS, HAD GIVEN HIM MY NAME OR SOMETHING. I DON'T
10 KNOW.
11 IF I WAS WILLING TO TALK ABOUT IT.
12 I SAID YES.
13 HE GOES, "CAN YOU FLY UP HERE TOMORROW
14 MORNING, 8:00," I THINK IT WAS. I SAYS, YES.
15 Q DID HE PAY FOR YOUR PLANE TICKET?
16 A YEAH.
17 Q DID HE TELL YOU ANYTHING MORE ABOUT
18 MICHAEL FLYNN?
19 A JUST THAT HE WAS AN ATTORNEY THAT WAS
20 INTERESTED IN HELPING ME.
21 Q DID HE TELL YOU ABOUT A CLASS ACTION SUIT
22 THAT MR. FLYNN HAD FILED AGAINST THE CHURCH OF SCIENTOLOGY?
23 A NO, I DON'T THINK SO -- ON THE TELEPHONE
24 THERE?
25 NO. I JUST THINK -- I DON'T REMEMBER